Findings & Recommendations

For The Stream Assessment & Compensation
Methodologies
currently proposed by
VA Department of Environmental Quality (DEQ) and
U.S. Army Corps of Engineers (COE)

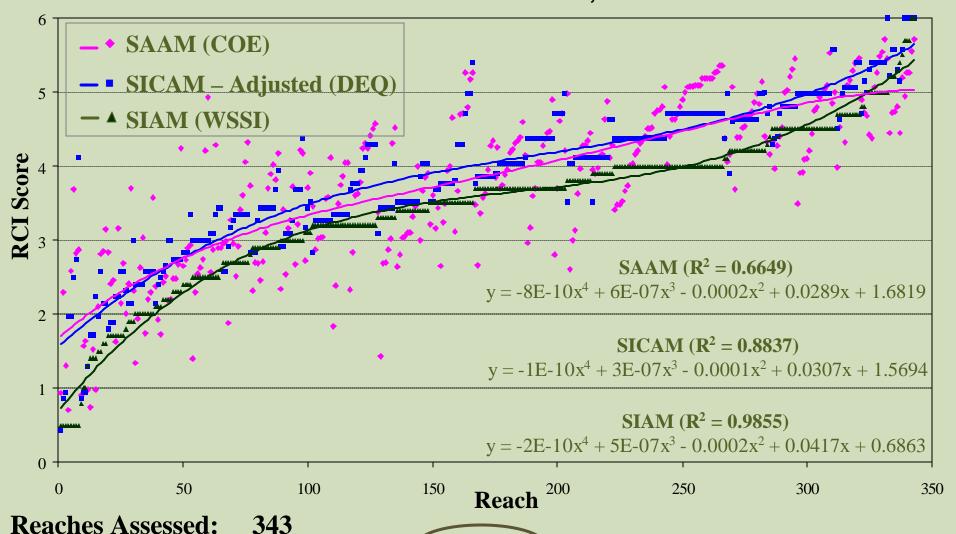
Presented by Michael S. Rolband

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Comparison of the U.S. Army Corps of Engineers SAAM, the Virginia Department of Environmental Quality SICAM, & the Wetland Studies and Solutions, Inc. SIAM



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Total Reach Length: 127,374 LF

What is the Message from this data?

- SAAM scores are more variable
 - » Due to Bank Height Ratio (BHR)
 - Impossible to accurately identify, in the field, bankfull & low bank in eroding or incising rural & urban/suburban streams.
- SICAM & SAAM value streams higher than appropriate
 - » Based upon comparison with SIAM which was calibrated using "The good, the bad, and the ugly" (an interagency team agreed upon the relative value of these 3 streams):



$$SAAM = 5.72$$

$$SICAM_{adj} = 6.0$$

$$SIAM = 6.0$$



SAAM = 3.58 (bkf = 1.8', BHR = 2.78) **SICAM**_{adj} = 4.3 **SIAM** = 3.5



BKF disagreement: 1.0' – 2.0'

SAAM = 2.57 (bkf = 2.0', BHR = 2.60)
= 1.78 (bkf = 1.0', BHR = 5.20)

SICAM_{adj} = 2.2

SIAM = 1.7



What is the Message from this data?

- SAAM provides a false sense of accuracy (0.01), while SICAM starts with measurements for a moderate level of accuracy that are obscured by SQF.
- Either of the existing methodologies (SAAM or SICAM) could be used as the stream assessment methodology with a few modifications.

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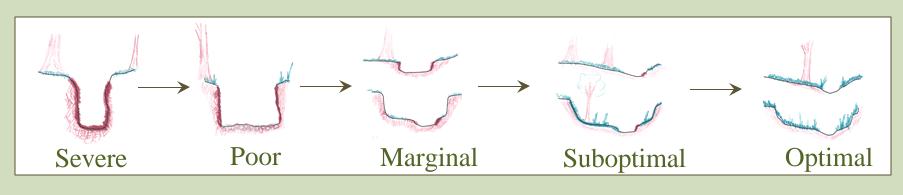


COE Assessment

Finding #1: BHR is hard to accurately determine in the field, even by trained professionals.

- » Impossible to accurately identify, in the field, bankfull & low bank in eroding or incising rural & urban/suburban streams.
 - Dave Rosgen informed COE staff of this issue on Feb. 22, 2006. COE indicated agreement but that policy overruled technical basis of evaluation.
- » Measurement is not easily repeatable in eroding or incising rural & urban/suburban streams.
 - Misinterpretation of bankfull & low bank features.
 - BHR may vary depending on where measurements are taken.
 - Appropriate Regional Curves (for small size D.A.'s typically encountered) are not available to confirm observed field indicators.

Solution #1: Remove BHR calculation from the channel condition indice, & replace with an evaluation of the channel's status along the evolutionary process.





COE Assessment

Finding #2: When BHR = 3.0, an adjustment factor is applied to riparian & channel alteration indices (value is not based upon the literature).

- 1) Streams highly unstable at BHR = 1.63
- 2) Reduction in Riparian Score should occur at lower BHR's & not be a step-function relationship.
- 3) Assumes a direct correlation between channel alteration & channel incision. (*Not always true*)

Solution #2: Revise Scoring weights

- 1) Remove adjustment factor.
- 2) Value indices, within overall RCI score, on their contribution to overall stream condition.

Examples of Bank Height Ratios (BHR) for Stability Evaluation

Stability Rating	BHR
Stable	1.0 -1.09
Mod. Unstable	1.1 - 1.44
Unstable	1.45 – 1.62
Highly Unstable	= 1.63

^{*} From Watershed Assessment of River Stability & Sediment Supply (WARSSS) Version 1.0 (Rosgen & EPA)

Examples Using Existing Parameters

Parameter	Score
1. Channel Condition	(2.0)
2. Riparian Buffer	(1.0)
3. Bank Stability	(1.0)
4. Sediment Dep	(0.5)
5. Channel Alteration	(0.5)
(Total RCI Score):	6.0



COE Assessment

Finding #3: Manual needs refinement.

Solution #3: Minor Improvements:

- » Revise manual to account for ephemeral & low gradient streams.
- » Include all calculations on Forms.
- » Address special cases (i.e. pond located in riparian area).
- » Add example photos with captions (*provide examples of condition indicies & possible scores*).
- » Provide a reach summary page & a place for reach photo. Also allow a space for reach name on each form (*all pages*).
- » Clarify riparian definitions.
 - Difference between PSS, non-maintained herbaceous, utility easement & maintained lawns.
- » Clarify how rip-rap channels should be scored.
- » Only assess direct anthropogenic alterations to a reach (*i.e. remove stormwater input reference*).
- » Clarify how to score spot stablization within a reach.





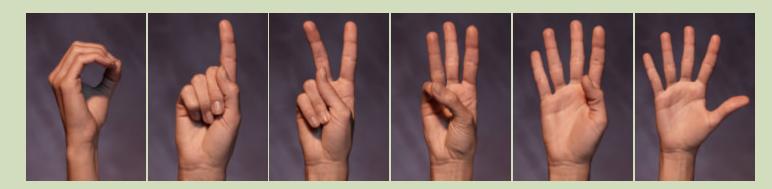
DEQ Assessment

Finding #1: The Stream Quality Factor (SQF) reduces the precision in the reach value initially provided by the RCI scores.

Solution #1: Remove SQF from assessment methodology & directly apply the RCI score to impact and compensation calculations.

OR

Use a single assessment practice & simply rank streams into 5 or 6 categories, and save lots of energy.





DEQ Assessment

Finding #2: Manual needs refinement.

Solution #2: Minor Improvements:

- » Assess bottomless culverts as a channel alteration only.
- » Remove inner/outer riparian buffer assessment.
- » Add description of how to score riparian area with small impervious areas & pedestrian trails.
- » Add captions to all photos, they should describe what photo is depicting.
- » Provide example scoring for naturalized man-made channels (i.e. channel condition & instream habitat scores for riprap channels).
- » Remove reference to floodplain and bankfull age on Optimal & Suboptimal channel condition.
- Revise marginal channel condition to include channels that have alternating bank stability
 (i.e. left bank = erosive and high,
 right bank = stable with floodplain access).





COE Impact & Compensation

Finding #1: This compensation method is an iterative process that requires a site specific compensation plan be tailored to each impact reach before compensation requirements can be determined.

» Makes calculating mitigation requirements very difficult for a site with multiple impact reaches & multiple compensation reaches.

Solution #1:

- » Separate Impact & Compensation calculations.
 - Computing stream compensation requirements independently enables both the applicants & agencies to know the total required compensation early in the development process.
- » Express Impact & Compensation values <u>in terms of SCUs</u> this should be the currency of stream impacts & mitigation. This will simplify the debiting & crediting procedure (*makes understanding, calculating, & reviewing much easier*).





COE Impact & Compensation

<u>Finding #2:</u> The compensation method does not take into account location (urban/rural), impact type, or stream size.

- » **Impact Type**. Values all impacts the same removes incentive to use less intrusive design/construction techniques.
- Location. Removes the incentive to restore urban streams (*cheaper to restore rural*)
 causes net loss in sustainable urban natural resources.
- » **Stream Size**. Lacks a method to correlate size of impact reach to compensation reach. This focuses restoration on smaller, easier (& cheaper) to restore headwaters & ignores larger streams.

Solution #2:

- » Assign values to different impact types.
- » Develop a <u>predefined</u> suite of restoration practices that are valued on required effort (*i.e. buffer enhancement vs. natural channel design*) & location (*urban/suburban vs. rural*) incentive for implementing all types of restoration.
- » Provide specifications & guidance for appropriate usage & value (SCUs/foot). Each practice should be assigned a defined level of mitigation lift (*eliminates opportunity for user error*).
- » Develop a relationship between compensation & impact reaches based on stream size.





DEQ Impact & Compensation

Finding #1: Expressing compensation requirements in terms of linear feet is misleading, and unnecessarily complicated.

- » When the impact reach is first defined by RCI another "value" is created, weighted linear feet (LF_w) not linear feet.
 - Length of Impact * SQF * Impact Factor = Compensation Required (LF_w)
 - Yet, it's <u>not</u> what you actually need to provide as Compensation as that varies based on your credit assigned to the compensation plan (*this may vary by 20 fold*).

Solution #1: Express Impact & Compensation values in terms of a common currency, Stream Condition Units (SCUs).

» This will simplify the debiting and crediting procedure because it will not confuse actual length of impact with the amount of compensation required and provided (makes understanding, calculating, & reviewing easier).





DEQ Impact & Compensation

Finding #2:

Current Credit Determination Worksheet adds unnecessary complexity; And,

This compensation method fails to adequately consider restoration type/location & does not take into account stream size.

- » **Restoration Type.** User must calculate a project specific ratio and adjustment factor (*creates an opportunity for user error*).
- » **Location.** This method applies a factor that attempts to account for the increase in cost for urban restoration; however, the variance is not enough to prevent continued export of stream resources to rural areas.
- » **Stream Size**. Lacks a method to correlate size of impact reach to compensation reach. This focuses restoration on smaller, easier (& *cheaper*) to restore headwaters & ignores larger streams.

Solution #2:

- » Provide a <u>predefined</u> suite of restoration practices that are valued on required effort (*i.e. buffer enhancement vs. natural channel design*) & location (*urban/suburban vs. rural*) in lieu of credit ratios.
- » Provide specifications & guidance for appropriate usage & value (SCUs/foot). This simplifies compensation calculation don't have to calculate compensation ratio.
- » Develop a relationship between compensation & impact reaches based on stream size.

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Suggested Features for an effective Stream Manual

1. Assessment:

- » Easy to apply in a repeatable manner
- » Technically defensible

2. Impact & Compensation:

- » Use one common currency (SCUs).
- » Quantify impact based on severity (assign an "impact factor") to encourage "minimization" of impacts.
- » Consider location (urban/suburban & rural), stream size, and restoration technique.
- » Provide specific examples & definitions of restoration techniques & their resulting lift (in SCU's) to minimize interpretation conflict.

Either of the existing methodologies (SAAM or SICAM) could achieve these goals with a few modifications.





